



**File Code:** 1950; 2600; 5140

**Date:** May 30, 2019

## REQUEST FOR COMMENTS

Dear Interested Parties:

The Custer Gallatin National Forest (CGNF) is requesting public comment regarding our proposal to restore a variety of ecotonal vegetation communities across the forest, called the **Ecotonal Habitat Restoration Project**. This decision would restore and maintain certain habitats, critical ecosystem functions, and biodiversity at the local and landscape scales. A lack of recent wildfire, ongoing plant succession, and some past land management practices have resulted in undesirable habitat conditions within important ecotonal vegetation communities in locations on the CGNF. There are numerous examples of ecotones across the CGNF, however, we are focusing on six vegetation types of particular importance to species and biodiversity on the CGNF: aspen; whitebark and limber pine; grassland/forest interface; riparian areas; woody draws; and montane ponderosa pine. This proposal would follow the template currently being used to conduct aspen restoration across most of the montane portion of the CGNF. You are being contacted because you may be interested or affected by the implementation of this proposal. We are very interested in hearing your comments on this proposed action.

### **Background**

An ecotone is a transition area between two ecological communities on the CGNF, these transitions are often represented by more rare and less dominant vegetation types or communities. These communities typically occupy a small spatial footprint relative to more dominant surrounding vegetation types, averaging several hundred acres or less on the landscape in any one location. However, they may provide habitat for a much higher proportion of species than adjacent communities. For example, riparian habitats are estimated to be about 1% of land area of the western US (1-3% of area of the CGNF), yet as much as 80% of bird species, and >80% of all vertebrates are estimated to spend all or part of their lives in riparian areas.

The condition and distribution of ecotonal habitats across the landscape influences wildlife distribution, movements, population dynamics, and habitat; watershed function; and ecosystem resiliency to disturbance, including to climate change and wildfires. Ecological stressors on these habitats include encroachment of species from adjacent communities, reduced species recruitment, grazing/browse pressure, insects and disease, changes in hydrologic regime, and sensitivity to climatic changes. In general, disturbance agents like fire, floods, and windthrow at low or moderate intensities help maintain ecotonal habitats by creating habitat and plant successional mosaics.



## **Purpose and Need for Action**

There are several processes that have contributed to the deterioration of ecotonal communities on the CGNF. These include a lack of recent disturbance (primarily fire), ongoing plant succession, and impacts from past land management. Figure 1 lists the ecotonal vegetation types targeted in this proposal and the processes with potential to affect these communities. Restoring the health and vigor of ecotonal communities will improve wildlife habitat, increase resiliency to wildfire, and improve watershed health.

**Figure 1.** Processes with potential to reduce the health and vigor of ecotonal communities

<b>Process</b>	<b>Ecotonal Vegetation Community</b>					
	Aspen	Whitebark and Limber Pine	Meadow/Grassland and Forest Interface	Riparian Areas	Woody Draws	Montane Ponderosa Pine
Conifer colonization	X	X	X	X	X	X
Species conversion	X	X	X	X	X	X
Decadent stand health	X	X	X	X	X	X
Excessive browsing/grazing	X		X	X	X	
Increased susceptibility to high intensity wildfire	X	X	X	X	X	X
Loss of unique or important wildlife habitats	X	X	X	X	X	
Increased erosion/sedimentation due to inadequate vegetation cover				X		
Decreased prevalence and vigor of riparian vegetation due to channel entrenchment				X	X	

## **Proposed Action**

The proposed action is to restore ecotonal habitats—aspens, whitebark and limber pine, meadow/grassland and forest interface, riparian areas, woody draws, and montane ponderosa pine—in places where an assessment (Appendix A) indicates both a departure from desired habitat conditions and site conditions are favorable to support restoration actions. Restoration of these communities could occur in suitable habitats across the CGNF (see below regarding special management areas), with the exception that montane ponderosa pine restoration would only occur on the Yellowstone and Beartooth Ranger Districts.



This restoration proposal represents a programmatic level management decision that will allow the Forest Service to actively manage and maintain more ecotonal habitats closer to desired habitat conditions (Figure 1). Restoration efforts will be conducted using an adaptive management approach (Appendix A). This approach identifies factor(s) limiting the desired habitat condition, implements the simplest, most appropriate management option(s), conducts necessary post-treatment monitoring, and completes any additional management actions if needed (e.g. fencing from ungulates or domestic livestock).

Management options (Figure 2) that would be available to maintain or restore ecotonal communities across the CGNF could include but are not limited to:

- Removal and/or piling and burning of small conifers with hand crews
- Using mechanical equipment to cut and pile conifers: followed by pile burning  
Alternately, mechanical equipment could be utilized to masticate (chip) conifers
- Girdling (killing the tree but leaving it standing) larger conifers
- Prescribed fire (preceded by cutting down conifers where allowed but leaving them laying within the stand for fuel to carry a fire)
- Patch cutting or thinning; this could include piling and burning or removal of commercially sized conifers using a service or timber sale contract
- Cutting hardwoods to stimulate suckering, daylight, and/or provide physical barriers protecting hardwoods from browsing where needed
- Root separation (break up lateral roots at some distance from the parent aspen trees using mechanical equipment and a single shank ripping attachment run along the contour on suitable sites)
- Protection from browsing (including, but not limited to fencing or directional felling)
- Re-activating floodplains and elevating water tables in waterways using natural materials and accepted methods to restore or enhance riparian vegetation, floodplain function, and streambank stability (e.g. simulated beaver dams (beaver dam analogs), large woody debris introduction, and bioengineering techniques).

**Figure 2.** Potential ecotonal habitat restoration treatments and the corresponding ecotonal vegetation community where treatments would most likely occur.

Treatment	Ecotonal Vegetation Community					
	Aspen	Whitebark and Limber Pine	Meadow/ Grassland and Forest Interface	Riparian Areas	Woody Draws	Montane Ponderosa Pine
Hand Slashing, Limbing, Piling, or Girdling using chainsaw	X	X	X	X	X	X
Mechanical Mastication, Cutting, Piling, Chipping, Skidding	X	X	X	X	X	X

Mechanical Ripping	X					
Prescribed Fire	X	X	X	X	X	X
*Commercial Harvest	X	X			X	X
Instream Habitat Structures				X		
Planting Desirable Species	X	X		X	X	X
Biomass Utilization	X	X	X		X	X
Directional Felling	X			X	X	
Fencing	X			X	X	

\*commercial contracts could involve a variety of methods including post and pole, saw log, and biomass collection.

The goal of this programmatic management decision is the restoration and/or enhancement of landscapes and habitat. Commercial harvest could be used as a management option only if it meets site-specific restoration objectives.

Restoration projects in ecotonal communities will be monitored to allow for plant recovery. This management decision will work within existing livestock grazing management decisions and allotment management plans. The goal will be to implement identified treatments to achieve restoration objectives, monitor post-treatment results, and allow line officer discretion to take adaptive measures to manage on-going permitted livestock grazing activities to best maximize restoration benefits.

All potential projects must be within the scope of the Ecotonal Habitat Restoration CE. Project level reviews would be required prior to implementation. These reviews will document decision points within the adaptive management framework (Appendix A), be maintained in project files, and ensure compliance with all applicable law, policy, and regulation.

### **Project Design and Mitigation Features**

Project design and mitigation requirements will work within the framework of relevant forest plans and follow applicable standards, guidelines, and Best Management Practices during project design and implementation.

### **Special Management Areas**

No intentional ecotonal habitat restoration would be completed within designated wilderness, recommended wilderness, or wilderness study areas. Our proposal would be consistent with the Roadless Rule, including the cutting, sale, or removal of generally small diameter timber and that the cutting, sale, or removal must maintain or improve one or more roadless characteristics (294.13(b)(1)). Within designated research natural areas restoration would only occur if the proposed management maintains or achieves the desired condition and purpose for the specific research area and must be coordinated with the Rocky Mountain Research Station.



## **Project Implementation**

Project implementation would be ongoing and could span 10 to 15 plus years. We expect this management decision will result in 6-10 specific projects implemented annually across the forest. Projects would typically range in size from several acres to a few hundred acres. It is anticipated some projects could cumulatively exceed a thousand or more acres for the following reason(s):

- Lower intensity habitat management activities could be pursued over a larger area versus higher intensity treatments within smaller areas.
- Topography, aspect, or the existence of natural barriers enables prescribed fire to accomplish multiple treatments objectives over a larger area.
- Funding opportunities make it possible to pursue larger restoration efforts.

The Forest Service estimates based on existing capacity an average of between 500 and 5000 acres may be treated annually through the Ecotonal Habitat Restoration Project. This estimate is not intended to be limiting. In some years total restoration acreages could exceed 5000 acres. This estimate is highly dependent upon project design and objectives, weather conditions, personnel capacity, funding, access, seasonal restrictions, and other management considerations.

Implementation could utilize a variety of mechanical equipment including masticators, chippers, wheeled or tracked feller bunchers, skidders, etc. Prescribed fire implementation could also result in the utilization of equipment as required in the prescribed burn plan.

Ecotonal vegetation community restoration treatments could be implemented through Forest Service crews, ongoing programs such as post and pole, teepee pole, firewood, or Christmas bough collection, or service contracts.

## **Land and Resource Management Plans**

The Custer Gallatin National Forest consists of two individual proclaimed national forests: the Custer National Forest and the Gallatin National Forest. In 2014 the two Forests were combined to be administratively managed as one national forest. Currently, the CGNF is in the planning process of developing one new, unified forest plan that will provide direction for the combined Forest. The revised Plan direction will apply to all projects that have decisions made on or after the effective date of the final record of decision. The record of decision will also provide direction regarding project and activity consistency and transition to the revised plan pursuant to 36 CFR 219.15. Until the record of decision is issued revising the forest plans, the consolidated Forest continues to be managed pursuant to the Forest Plans developed for each Forest in the 1980's. A decision for the Ecotonal Habitat Restoration Project is planned before the revised Forest Plan is approved. Therefore, this decision has to be consistent with the Forest Plans for the Custer National Forest and the Gallatin National Forest (16 U.S.C. 1604(i)).

Forest Plans provide forest-wide goals, objectives, standards and specific management area direction for each Forest. The Land and Resource Management Plan for the Custer National Forest (hereafter, Custer Forest Plan, USDA 1986) and the Forest Plan for the Gallatin National

Forest (hereafter Gallatin Forest Plan, USDA 1987) each provide direction for the NFS lands of each national forest. Both the Custer Forest Plan and Gallatin Forest Plan have been amended several times. Applicable forest-wide goals, objectives and standards, as well as management area direction will be used for the Ecotonal Habitat Restoration Project, from each Forest's respective Plan. An initial review of applicable management areas direction from the Custer Forest Plan would include Management Areas B, C, D, E, G, J, M, N, R, and T (pp. 3-99). An initial review of applicable management areas direction from the Gallatin Forest Plan would include Management Areas 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 20, and 23 (pp. II-1 through III-92).

### **Decision To Be Made**

Preliminary analysis indicates the effects of the Ecotonal Habitat Restoration Project on the Custer Gallatin National Forest falls within a category of actions listed in the Code of Federal Regulations (CFR) that is excluded from documentation in an Environmental Assessment (EA) or Environmental Impact Statement (EIS) and no extraordinary circumstances exist that would preclude the use of the following category as follows:

#### **36 CFR 220.6(e)(6)**

***“Timber stand and/or wildlife improvement activities which do not include the use of herbicides or do not require more than one mile of low standard road construction”.***

***Examples include but are not limited to:***

- a. Girdling trees to create snags.*
- b. Thinning or brush control to improve growth or to reduce fire hazard including the opening of an existing road to a dense timber stand.*
- c. Prescribed burning to control understory hardwoods in stands of southern pine.*
- d. Prescribed burning to reduce natural fuel build-up and improve plant vigor.*

If it is determined that the degree of potential effects of approving this programmatic management decision would result in the existence of extraordinary circumstances, further environmental analysis and documentation may be warranted.

### **Public Involvement**

The Forest Service is interested in issues, concerns, and/or support you may have regarding the Ecotonal Habitat Restoration Project. In accordance with NEPA, potential environmental impacts will be considered, analyzed, and disclosed before a decision is made regarding project implementation. This request for comment and input is an attempt to collaboratively involve the public and other agencies in identifying concerns and issues associated with proposed activities.

The Forest Service will review comments received from project scoping to identify issues and/or concerns regarding the proposal. Issues are cause-effect relationships and serve to highlight effects of unintended consequences that may occur from the proposed action and provides opportunities during the analysis to explore alternative ways to meet the purpose and need for the

proposal while reducing adverse effects (FSH 1909.15, 12.42). Design features and mitigation measures will be further developed, refined, and described in detail in the environmental analysis and after scoping comments have been reviewed.

**Written, facsimile, hand-delivered, oral, and electronic comments will be accepted during the scoping comment period through July 3, 2019.** Comments should be within the scope and specific to the proposed action, have a direct relationship to the proposed action and include supporting reasons for the Responsible Official to consider. Please list specific treatment types or geographic areas where you have concerns. Issues identified from public comment may be used to modify or add project design features, mitigation, or alternatives, and will also be utilized to determine the appropriate level of environmental analysis and documentation required by NEPA.

Please contact the Custer Gallatin National Forest Supervisor's Office if you would like to continue to receive information about the **Ecotonal Habitat Restoration Project**. Your name will be removed from the mailing list for this project if you do not provide comment or specifically request to remain on the list. You may submit written, hand-delivered comments. Office business hours for those submitting hand-delivered are 8:00 AM to 4:30 PM, Monday through Friday, excluding holidays. For further information, to provide comment, or to remain on the project mailing list, please contact:

**Custer Gallatin National Forest  
Supervisor's Office  
PO Box 130; 10 E. Babcock  
Bozeman, MT 59715**

In addition, you may submit comments via FAX to 406-587-6758. Electronic comments via email must be submitted in one of the following formats: an email message, plain text (.txt), rich text (.rtf), or Word (.docx) to: [comments-northern-gallatin@fs.fed.us](mailto:comments-northern-gallatin@fs.fed.us). Use the name of the project as the subject line of your email (**Ecotonal Habitat Restoration Project**). Please provide your name, postal address, and telephone number. Comments received in response to this solicitation, including names and addresses of those who comment, will be considered part of the public record and will be available for public inspection.

For further information about the project please contact Drew Grimes or Josh Hemenway, Co-Project Leaders, at 406-446-4528 (Drew) or 406-587-6739 (Josh).

Sincerely,



MARY C. ERICKSON  
Forest Supervisor

